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Attorneys for Plaintiff and Counterdefendant
 GLOBALSANTAFE DRILLING
 COMPANY

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

GLOBALSANTAFE DRILLING
 COMPANY,

Plaintiff,

v.

THE INSURANCE COMPANY OF THE
 STATE OF PENNSYLVANIA, et al.,

Defendants.

THE INSURANCE COMPANY OF THE
 STATE OF PENNSYLVANIA,

Counter-Claimant and
 Cross-Claimant,

v.

GLOBALSANTAFE DRILLING
 COMPANY, et al.,

Counter-Defendant
 And Cross-Defendants.

Case No. C-05-4411 CW

STIPULATION AND ORDER
 EXTENDING TIME FOR DEFENDANT
 HIGHLANDS INSURANCE COMPANY
 TO FILE RESPONSIVE PLEADING

Hon. Claudia Wilken
 Courtroom 2, 4th Floor

Action Filed: 7/29/05
 Action Removed: 10/28/05

1 **WHEREAS** Defendant Highlands Insurance Company ("Highlands") was served with a summons
2 and a copy of the First Amended Complaint while this action was pending in State court by Plaintiff
3 GlobalSantaFe Drilling Company ("GSFDC");
4

5 **WHEREAS** Highlands' response time had not run before this action was removed and
6 Highlands' response date is currently December 2, 2005;

7 **WHEREAS** Highlands is in receivership under the auspices of the State of Texas'
8 Department of Insurance ("DOI") and expects to eventually bring a motion to have these proceedings
9 stayed as to Highlands only;
10

11 **WHEREAS** GSFDC is willing to grant Highlands an extension of its time to respond until
12 ten (10) days after the issuance of this Court's decision on GSFDC's remand motion currently
13 scheduled for hearing on December 23, 2005, and Highlands has not sought prior extensions from
14 this Court;
15

16 **IT IS STIPULATED** BY GSFDC and HIGHLANDS that Highlands may have until
17 ten (10) days after the date of this court's ruling on GSFDC's remand motion in which to respond to
18 the First Amended Complaint.
19

20 Respectfully submitted,
21

22 DATED: November 22, 2005
23

PILLSBURY & LEVINSON, LLP

24 By 
25 RICHARD D. SHIVELY, ESQ.
26 Attorneys for Plaintiff,
27 GLOBALSANTAFE DRILLING COMPANY
28

1
2
3 DATED: November 22, 2005

FAINSBERT MASE & SNYDER, LLP

4
5 By: 

6 RICHARD E. WIRICK, ESQ.
7 Attorneys for Defendant
8 HIGHLANDS INSURANCE COMPANY
9

10 ORDER

11 IT IS SO ORDERED.

12
13 Dated: 11/23/05

14
15 By

16 CLAUDIA WILKEN
17 United States District Judge
18



PROOF OF SERVICE

I, the undersigned, declare that I am a citizen of the United States; my business address is The Transamerica Pyramid, 600 Montgomery Street, 31st Floor, San Francisco, California 94111; I am employed in the City and County of San Francisco; I am over the age of eighteen (18) years and not a party to the within action.

On November 22, 2005, I served the foregoing:

• **STIPULATION AND ORDER EXTENDING TIME FOR DEFENDANT
HIGHLANDS INSURANCE COMPANY TO FILE RESPONSIVE
PLEADING**

addressed as follows:

Samuel A. Keesal, Jr.
Gordon C. Young, Esq.
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*Attorney for Defendants Mutual Insurance
Association GARD; The United Kingdom
Steam Ship Assurance Association
(Bermuda) Ltd; and AEGIS (Steamship
Mutual Underwriting Assoc. Ltd.)*

X (Via E-File) Electronic Filing.

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<p>Deborah A. Aiwasian, Esq. Berman & Aiwasian 725 S. Figueroa Street, Suite 1050 Los Angeles, CA 90017 Telephone: (213) 833-3205 Facsimile: (213) 833-3230</p> <p><i>Attorney for Defendant Insurance Company of North America</i></p>	<p>Peter B. Ackerman Duane Morris LLP 333 S. Hope Street, 23rd Floor Los Angeles, CA 90071 Telephone: (213) 229-2900 Facsimile: (213) 229-2999</p> <p><i>Attorney for Defendant Underwriters at Lloyd's London and Insurance Companies</i></p>
<p>Richard E. Wirick, Esq. Fainsbert Mase & Snyder, LLP 11835 West Olympic Boulevard, Suite 1100 Los Angeles, CA 90064 Telephone: (310) 473-6400 Facsimile: (310) 473-8702</p> <p><i>Attorney for Defendant Highlands Insurance Company</i></p>	<p>Michael George Vice President Greenwich Insurance Company Seaview House 70 Seaview Avenue Stamford, CT 06902-6040</p> <p><i>Attorney for Defendant Greenwich Insurance Company</i></p>
<p>Edward J. Tafe Colliau Elenius Murphy Carluccio Keener & Morrow 405 Howard Street, Suite 600 San Francisco, CA 94105 Telephone: (415) 932-7575 Facsimile: (415) 932-7001</p> <p><i>Attorney for Defendant Harbor Insurance Company</i></p>	<p>Kathleen E. Bailey Clausen Miller P.C. 2040 Main Street, Suite 500 Irvine, CA 92614 Telephone: (949) 474-3100 Facsimile: (949) 474-3190</p> <p><i>Attorney for Defendant, Counterclaimant and Crossclaimant The Insurance Company of the State of Pennsylvania</i></p>

— (Via Personal Delivery) by causing to be delivered on the same day by courier a true copy thereof, enclosed in a sealed envelope, to the interested parties at the addresses set forth above.

X (Via Mail) by placing a true copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth above. I am readily familiar with this firm's practice for collection and processing of correspondence for mailing with the U.S. Postal Service. Following ordinary business practices and placing for collection and mailing at The Transamerica Pyramid, 600 Montgomery Street, 31st Floor, San Francisco, California 94111, in the ordinary course of business, the above documents would have been deposited for first-class delivery with the United States Postal Service the same day they were placed for deposit, with postage thereon fully prepaid.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on November 22, 2005, at San Francisco, California.

PROOF OF SERVICE -- Case No. C-05-4411 CW